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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>MONICA GONZALEZ</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1038(a) (threatening to</b>
	<b>:</b>	<b>commit violent crimes involving</b>
	<b>:</b>	<b>explosives and anthrax using false</b>
	<b>:</b>	<b>information and hoaxes - 5 Counts)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Wells-Fargo Auto Finance, Inc. was an automobile lender which sold automobile finance and leasing products throughout the United States and Canada, and maintained offices located at 2501 Seaport Drive, Chester, Pennsylvania ("the Wells-Fargo facility").

2. Approximately 730 employees of Wells-Fargo Auto Finance worked at the Well-Fargo facility, and approximately 9 other businesses, employing approximately 650 employees, occupied space in the building in which the Wells-Fargo facility was located.

3. Defendant MONICA GONZALEZ was employed at the Wells-Fargo facility as an operations clerk.

4. On or about April 24, 2008, in the City of Chester, in the Eastern District of Pennsylvania, defendant

**MONICA GONZALEZ**

intentionally conveyed false and misleading information that a bomb would detonate in the Wells-Fargo facility that day, under circumstances where such information may reasonably have been believed, which indicated that an activity would take place that would constitute a violation of 18 U.S.C. § 844(I).

All in violation of Title 18, United States Code, Section 1038(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 3 of Count One of this indictment are realleged here.
2. Anthrax is an acute disease in humans and animals caused by the bacterium *Bacillus Anthracis*, which is highly lethal in some forms. Anthrax spores can be grown in vitro and used as a biological weapon.
3. On or about April 28, 2008, in the City of Chester, in the Eastern District of Pennsylvania defendant

**MONICA GONZALEZ**

intentionally conveyed false and misleading information that a white colored powder found inside a United Parcel Service envelope delivered to a Wells-Fargo employee inside the Wells-Fargo facility contained *Bacillus anthracis*, the causative agent for anthrax, under circumstances where such information may reasonably have been believed, which indicated that an activity would take place that would constitute a violation of Title 18 United States Code, Section 175(a).

All in violation of Title 18, United States Code, Section 1038(a).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 3 of Count One of this indictment are realleged here.
2. On or about May 19, 2008, in the City of Chester, in the Eastern District of Pennsylvania defendant

**MONICA GONZALEZ**

intentionally conveyed false and misleading information that a package containing an explosive substance would arrive at the Wells-Fargo facility that day, under circumstances where such information may reasonably have been believed, which indicated that an activity would take place that would constitute a violation of Title 18 United States Code, Section 844(I).

All in violation of Title 18, United States Code, Section 1038(a).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 3 of Count One of this indictment are realleged here.
2. On or about May 27, 2008, in the City of Chester, in the Eastern District of Pennsylvania, defendant

**MONICA GONZALEZ**

intentionally conveyed false and misleading information that a package containing an explosive substance would arrive at the Wells-Fargo facility, under circumstances where such information may reasonably have been believed, which indicated that an activity would take place that would constitute a violation of Title 18 United States Code, Section 844(I).

All in violation of Title 18, United States Code, Section 1038(a).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 3 of Count One of this indictment are realleged here.
2. On or about July 14, 2008, in the City of Chester, in the Eastern District of Pennsylvania, defendant

**MONICA GONZALEZ**

intentionally conveyed false and misleading information that the Wells-Fargo facility was under an urgent bomb threat warranting evacuation, under circumstances where such information may reasonably have been believed, which indicated that an activity would take place that would constitute a violation of Title 18 United States Code, Section 844(I).

All in violation of Title 18, United States Code, Section 1038(a).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**LAURIE MAGID**  
**ACTING UNITED STATES ATTORNEY**